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February 24, 2022

Via ECF and Email

Honorable Michael B. Kaplan
Chief United States Bankruptcy Judge
United States Bankruptcy Court
Clarkson S. Fisher US Courthouse
402 East State Street
Trenton, NJ 08608

Re: LTL Management LLC
Case no. 21-30589 MBK

Dear Judge Kaplan:

We write, on behalf of TCC I, in response to correspondence filed by counsel for the Debtor at docket #1562.

We are disappointed, but unfortunately not surprised, that Mr. Gordon has failed to inform Your Honor that, less than two months ago, he took the exact opposite position with regard to the appointment of an examiner, in response to the motion of the United States Trustee. The U.S. Trustee's examiner motion was withdrawn at the suggestion of the Court.

Attached hereto is Mr. Gordon's letter to the Court dated December 29, 2021 [docket #1002], in which he states "the appointment of an examiner is neither necessary nor appropriate". In his December 29th letter, Mr. Gordon continues "for these reasons and others, the appointment of an examiner would be duplicative and wasteful and would only delay the case."

Mr. Gordon was (and remains) correct in his December 29th letter with respect to the appointment of an examiner and is absolutely wrong in his curious new position on the issue, which should be seen and understood for what it is, yet another "litigation tactic" by the Debtor.



Honorable Michael B. Kaplan
LTL Management, LLC
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We thank the Court for its consideration of the within correspondence.

Respectfully yours,

GENOVA BURNS LLC

DANIEL M. STOLZ

DMS:lld

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